

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

KIMBERLY KJESSLER, KLAIRE  
RUECKERT, LAURA BRALEY, TIMOTHY  
HAYDEN and SUMMER LANG, individually  
and on behalf of all others similarly situated,

*Plaintiffs,*

v.

ZAAPPAAZ, INC., AZIM MAKANOJIYA,  
NETBRANDS MEDIA CORP.,  
MASHNOON AHMED, GENNEX MEDIA,  
LLC, BRANDECO, L.L.C., AKIL KURJI,  
CUSTOM WRISTBANDS INC., and  
CHRISTOPHER ANGELES,

*Defendants.*

Civil Action No. 4:18-cv-0430  
(Consolidated)

**DECLARATION OF JOSHUA H. GRABAR IN SUPPORT OF  
MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

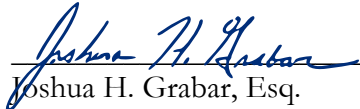
I, Joshus H. Grabar, Esq., declare as follows:

1. I am a partner at Grabar Law Office. I submit this declaration in support of Plaintiff's motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action").
2. My firm served as Plaintiffs' Counsel in the Action.
3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through and including today's date. The total number of hours spent by my firm during this period was 58.8, with a corresponding total lodestar (at historical rates) of \$45,570.00. This schedule was prepared from contemporaneous daily time records prepared and maintained by my firm. In connection with representing the Plaintiffs

in the Action, my firm did the following: investigating the underlying factual record and developing the legal theories of the case; drafting an initial complaint; responding to discovery served by Defendants and coordinating with Plaintiff Hayden regarding the same; coordinating case strategy and discovery with Plaintiffs' co-counsel. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$0.00 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including today's date. These costs are set forth in the Schedule attached as Exhibit 2 and are reflected in the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

  
Joshua H. Grabar, Esq.  
Partner  
Grabar Law Office

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**EXHIBIT 1 TO THE DECLARATION OF JOSHUA H. GRABAR IN SUPPORT OF  
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**Reported Hours and Historical Lodestar**  
Inception Through Today's Date

<b>Name</b>	<b>Position</b>	<b>Hours</b>	<b>Historical Rate</b>	<b>Lodestar</b>
Joshua H. Grabar	P	58.8	\$775.00	\$45,570.00
<b>TOTAL</b>				

**Role Legend**

P Partner  
S Shareholder  
SC Senior Counsel  
OF Of Counsel  
A Associate  
LC Law Clerk

PL Paralegal  
I Investigator  
SA Staff Attorney  
CA Contract Attorney

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**EXHIBIT 2 TO THE DECLARATION OF \_\_\_\_\_ IN SUPPORT OF  
MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

**Summary Expense Report**  
Inception Through Today's Date

<b>Expense</b>	<b>Total Amount</b>
Electronic Research (Lexis/Westlaw/PACER)	
Court Costs – Filing Fees	
Litigation Fund Contribution	
Federal Express/Overnight Delivery/Messengers	
Photocopies – In House	
Photocopies – Outside	
Postage	
Service of Process Fees	
Telephone/Fax	
Transportation/Meals/Lodging	
Co-Counsel Fees	
Experts/Consultant Fees	
Court Reporter Service/Hearing Transcript Fees	

TOTAL EXPENSES	\$0.00
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